

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**ROBERT V. TOWNES, IV,
Individually and on behalf of
all persons similarly situated.**

Plaintiff,

vs.

**TRANS UNION, LLC, AND
TRUELINK, INC.,**

Defendants.

CIVIL ACTION
04-1488-JJF

CLASS ACTION

**CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF REASONABLE EXPENSES**

Comes now the Plaintiff, Robbie Townes, and the law firms of Pope McGlamry Kilpatrick Morrison & Norwood, LLP (“Pope McGlamry”) and Battle Fleenor Green Winn & Clemmer LLP (“Battle Fleenor”), Class Counsel in the above-referenced action, and pursuant to Fed. R. Civ. P. 23(h) and 54(d), hereby move the Court for an award of attorneys’ fees and reimbursement of expenses, in the aggregate amount of \$1,200,000.00, as compensation to Class Counsel for the time and effort expended in prosecuting the above-referenced case and in negotiating and effectuating the class action settlement reached therein. Pursuant to the Settlement Agreement between the parties, the attorneys’ fees and expenses awarded to Class Counsel will be paid by the Defendants and not deducted from the class recovery.

The bases for this Motion are set forth in the Brief filed contemporaneously herewith.

/s/ Carmella Keener
Carmella P. Keener (DSBA No. 2810)
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Certificate of Counsel Pursuant to D. Del. Loc. R. 7.1.1

I, Carmella P. Keener, Esquire, do hereby certify that the parties have made a good faith effort to reach agreement on the matter at issue in the foregoing Motion, and the Motion reflects Plaintiff's Counsel's application for Court approval of the agreement reached among the parties.

/s/ Carmella Keener
Carmella P. Keener (DSBA No. 2810)

CERTIFICATE OF SERVICE

I, Carmella P. Keener, hereby certify that on this 20th day of August, 2007, I caused the foregoing document to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following:

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